



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF

C-14J

May 23, 2001

Thomas Wilczak, Esquire
Pepper Hamilton LLP
36th Floor
100 Renaissance Center
Detroit, Michigan 48243-1157

RE: South Green Avenue Site

Dear Tom:

After considering public comment on the Engineering Evaluation/Cost Analysis (EE/CA) for the South Green Avenue site, U.S. EPA has determined that excavation with off-site disposal, which is the recommended removal action in the EE/CA, is the appropriate remedy for this site. For your information, enclosed is the United States Environmental Protection Agency's (U.S. EPA) response to comments.

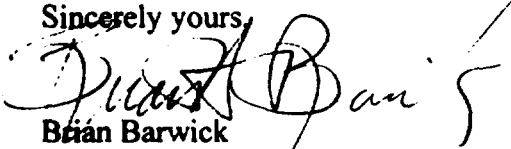
Pursuant to Section V, Paragraph 2.1 of the July 31, 1998, Administrative Order on Consent, Michcon must submit for U.S. EPA approval a workplan for implementation of the selected remedy. On May 3, Michcon technical staff and Ralph Dollhopf of U.S. EPA agreed that Michcon can submit such a workplan within twenty (20) business days of the date of this letter. The workplan must include the following activities and an expeditious schedule for completion of the removal action:

- (1) Start and completion dates for on-site construction activity; and
- (2) Submission of a final report as required by Section V, Paragraph 2.6 of the AOC.

Once approved by U.S. EPA, the workplan and schedule shall be fully enforceable under the AOC.

If you have any questions concerning this letter, please call me at (312) 886-6620.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brian Barwick", written over the typed name.

Brian Barwick
Assistant Regional Counsel
United States Environmental Protection Agency

Enclosure

cc: Ralph Dollhopf (SE-GI)

SOUTH GREEN AVENUE SUPERFUND SITE
Detroit, Michigan

**RESPONSIVENESS SUMMARY FOR COMMENTS TO CERCLA
ENGINEERING EVALUATION/COST ANALYSIS (EE/CA)
AND PROPOSED REMEDY**

A. Overview

The U.S. Environmental Protection Agency (U.S. EPA) has accepted and considered public comment on the Engineering Evaluation/Cost Analysis (EE/CA) and proposed remedy for the South Green Avenue Site in Detroit, Michigan. Nothing in the comments warrants the withdrawal or modification of the EE/CA and proposed remedy. U.S. EPA's responses to the comment received are included in Part E of this document.

B. Site Description and History

The Site is approximately 3.8 acres in size and located in an urban/industrial area in Detroit, Michigan. The Site is bordered to the northwest by Chcsapeake and Ohio Railroad tracks, to the northeast by Post Street, to the southeast by a commercial business, and to the southwest by South Green Avenue and a commercial produce distributor. The nearest residential areas are approximately 0.25 miles south and southeast of the Site. Southwestern High School is located at the southeastern corner of Post and Fort Streets.

The Detroit City Gas Company, subsequently known as the Michigan Consolidated Gas Company (Michcon), owned and operated a carburceted water gasification plant at the Site between 1913 and 1945. The American Charcoal Company operated on the Site from 1945 through 1976, whereupon Michcon sold the site to A Scrap Iron Metal Company. From 1976 through 1995, the site was utilized as a scrap metal storage and processing facility. In 1995, the property reverted to the State of Michigan for non-payment of property taxes. Since 1997, the City of Detroit has owned the property.

In 1997, the Michigan Department of Environmental Quality (MDEQ) removed from the Site 37 drums containing oils, resins, paint sludge, petroleum distillates and phosphoric acid. Subsequently, the City of Detroit demolished the on-site building.

C. U.S. EPA Actions

In February 1998, U.S. EPA conducted a Site Assessment finding scattered over the site piles of construction debris, tires, stained soils, drums and containers of various sizes and states of

deterioration, and two rusted and decayed capacitors and associated oily stained soils. Subsequent sampling and analysis of the stained soils confirmed the presence of polychlorinated biphenyls (PCBs) in concentrations as great as 100,000 milligrams per kilogram (mg/kg).

In April and May 1998, U.S. EPA issued action memorandums documenting the determination that Site conditions presented an imminent and substantial endangerment to human health, welfare, and the environment. In the Spring and Summer of 1998, U.S. EPA conducted a fund lead removal action at the Site in order to address surface and near-surface PCB contamination. Pursuant to a July 31, 1998, Administrative Order on Consent (AOC), Michcon agreed to conduct an EE/CA, implement a remedy selected by U.S. EPA, and to pay U.S. EPA's costs related to the Site.

D. Public Notice and Comment of the EE/CA and Proposed Remedy

On August 30, 2000, after several rounds of review and comment, Michcon submitted a final EE/CA to U.S. EPA. Based on the EE/CA, U.S. EPA proposed to select excavation and off-site disposal of contaminated soils. U.S. EPA Region 5's Office of Public Affairs (OPA) arranged a 30 day public notice and comment period with the opportunity to request a public hearing. OPA caused appropriate notices to be placed in the local media, and sent fact sheets to a list of potentially interested citizens and elected officials. No one requested a public meeting and only one comment was received.

E. Response to Comments

U.S. EPA received one comment which supported the proposed remedy but also asked the following questions (in bold):

Prior to the excavated area being filled will testing be done to ensure all contaminated soil and related debris has indeed been removed?

U.S. EPA Response: Yes. Upon completion of the excavation activities, confirmation samples will be collected for laboratory analysis from the sidewalls and bottom of the excavation. These samples will be used to determine whether the remaining soils meet applicable cleanup standards prior to backfilling the excavation with imported material.

Once removed will testing be (conducted) for possible contamination to water, air, nearby homes and businesses?

U.S. EPA Response: No. As a part of the site investigation, ambient air, groundwater, and soil samples were collected and analyzed in order to characterize the nature and extent of the on-site contamination. Based on those samples, it does not appear that contamination from the site has migrated off-site. Therefore, off-site properties will not be sampled as a part of this removal action.

What other risks should the neighborhood be concerned about? We have the South Green Avenue Site to rear left and Detroit Coke to our rear right. Do we have a cause for concern?

U.S. EPA Response: Implementation of this removal action will address risk associated with the South Green Avenue site only. Therefore, the South Green Avenue Site investigation did not identify and characterize other risks in the neighborhood. In addition, in its current state the South Green Avenue Site does not present risk to off-site persons. Once the removal action is completed, the South Green Avenue Site should not present unacceptable risk to persons who enter the Site. With respect to Detroit Coke, U.S. EPA records indicate that this site is being cleaned up under the direct supervision of the State of Michigan. Therefore, questions concerning the Detroit Coke Site would be best directed to Mr. Ed Novak, SEM District Office, Michigan Department of Environmental Quality, Environmental Response Division, 300 River Place, Suite 3600, Detroit, Michigan 48207.